

REMARKS

In accordance with the foregoing, claim 62 has been amended. Claims 1-3, 6-13, 15-25, 52-54, and 57-70 are pending, with claims 1, 52, and 67 being independent. No new matter is presented in this Amendment.

Claim Amendments

Claim 62 has been amended to correct a typographical error.

Claim Rejections Under 35 USC 103

Claims 1-3, 6-13, 15-25, 52-54, and 57-70 have been under 35 USC 103(a) as being unpatentable over Lamkin et al. (Lamkin) (U.S. Patent Application Publication No. 2002/0078144) in view of Montulli (U.S. Patent No. 6,34,592). This rejection is respectfully traversed.

Claim 1

Feature 1

It is submitted that Lamkin and Montulli do not disclose or suggest "a markup document supporting an interactive function for reproducing the AV data and comprising a command program, the command program comprising a cookie generation command program" as recited in independent claim 1.

The Examiner states "Lamkin teaches the playback of audio and/or video embedded within a web page (p. 4, par. 74) which contains a command program (p. 4, par. 84) to generate cookies (p. 11, par. 205-p. 12, par. 218)."

Although paragraph [0074] of Lamkin relied on by the Examiner discloses examples of how to embed audio and/or video within an HTML-encoded web page using an object tag or an embed tag, and thus may arguably be considered to disclose "a markup document supporting an interactive function for reproducing the AV data" as recited in claim 1, the examples in paragraph [0074] do not comprise "a cookie generation command program" as recited in claim

1. Furthermore, paragraph [0084] of Lamkin relied on by the Examiner does not disclose that the examples in paragraph [0074] comprise "a cookie generation command program" as recited in claim 1, and in fact does not disclose anything whatsoever about cookies.

Paragraphs [0205]-[0218] of Lamkin relied on by the Examiner disclose two types of cookies—system cookies, which are described in paragraphs [0207]-[0213], and general-purpose cookies, which are described in paragraphs [0207] and [0214]. However, paragraph [0207] discloses that the system cookies are automatically created and modified by the player hardware and embedded browser, rather than by "a cookie generation command program" as recited in claim 1 in an HTML-encoded web page in which audio and/or video is embedded as described in paragraph [0074] of Lamkin. Furthermore, paragraphs [0207] and [0214] of Lamkin disclose that the general-purpose cookies are placed by web pages on general web sites. However, it is not seen where anything whatsoever in Lamkin discloses or suggests that these web pages on general web sites are HTML-encoded web pages in which audio and/or video is embedded as disclosed in paragraph [0074].

Furthermore, paragraph [0129], lines 1-3, of Lamkin discloses that the embedded web browser 410 receives HTML/JavaScript content from the disk 738, which is displayed by the presentation engine 612, while paragraph [0129], lines 12-14, of Lamkin discloses that the embedded web browser 410 also receives cookies from the cookie manager 708 via the cookie API, generally in response to the accessing of an Internet web site. Assuming *arguendo* that the HTML/JavaScript content received from the disk 738 may be "a markup document supporting an interactive function for reproducing the AV data" as recited in claim 1, it is not seen where anything whatsoever in Lamkin discloses or suggests that this HTML/JavaScript content comprises "a cookie generation command program" as recited in claim 1, or that the cookies the cookie manager receives from the Internet web site are generated by "a cookie generation command program" in "a markup document supporting an interactive function for reproducing the AV data" as recited in claim 1.

Although not relied on by the Examiner in the rejection of claim 1, paragraph [0104] of Lamkin discloses that the embedded web browser 410 is responsible for displaying the HTML content authored on InterActual-compatible disks, stored locally on device 602, or served from a remote server location. Assuming *arguendo* that the HTML content referred to in this passage is "a markup document supporting an interactive function for reproducing the AV data" as recited in

claim 1, it is not seen where anything whatsoever in Lamkin discloses or suggests that this HTML content comprises "a cookie generation command program" as recited in claim 1, regardless of whether this HTML content is stored locally on device 602, or served from a remote server location. Pages 13-79 of Lamkin contain a detailed description of commands, properties, and events for several embodiments of the InterActual Application Programming Interface 742 shown in FIG. 7 of Lamkin that processes the HTML/JavaScript content 740 that is authored on an InterActual-compatible disk 738 (see paragraphs [0240] through [0260] of Lamkin). However, the detailed description of the commands, properties, and events on pages 13-79 of Lamkin do not disclose anything whatsoever relating to cookies.

For at least the reasons discussed above, it is submitted there is no basis whatsoever in Lamkin for the Examiner's conclusion that the HTML-encoded web pages in which audio and/or video is embedded disclosed in paragraph [0074] of Lamkin comprise "a cookie generation command program" as recited in claim 1 to generate the cookies described in paragraphs [0205]-[0218] of Lamkin. Accordingly, it is submitted that Lamkin does not disclose or suggest "a markup document supporting an interactive function for reproducing the AV data and comprising a cookie generation command program" as recited in claim 1. Furthermore, it is submitted that Montulli does not disclose or suggest this feature of claim 1, since it is not seen where Montulli discloses or suggests "a markup document supporting an interactive function for reproducing the AV data" as recited in claim 1.

Feature 2

As recognized by the Examiner, Lamkin does not disclose or suggest the feature "wherein the interpreter executes the cookie generation command program of the command program to: generate a cookie comprising: cookie data to be used by the interactive digital content reproducing apparatus in a subsequent interactive digital content reproducing operation performed in the interactive digital content reproducing apparatus; and a domain attribute identifying the interactive digital content reproducing apparatus as a domain; and store the cookie in the non-volatile data storage portion of the data storage unit" recited in claim 1. However, the Examiner considers this feature to be taught by the combined teachings of Lamkin and Montulli.

The Examiner states that "Lamkin does not explicitly teach that the cookie data contains *a domain attribute identifying the interactive digital content reproducing apparatus as a domain*; however Lamkin's teaching of the use of a cookie to contain a hardware identifier of a device (p. 12, par. 209, 213) strongly suggests the limitation but does not teach storing the apparatus, i.e., hardware, identifying information as a domain attribute." The Examiner states that "Montulli teaches that the cookie domain attribute can be set by the server system in order to retain state information." The Examiner concludes that "it would have been both obvious and desirable to identify the reproducing apparatus [presumably of Lamkin] as a domain, since Montulli teaches a method of using the domain attribute to track general categories of state dependent information."

Paragraph [0209] of Lamkin relied on by the Examiner discloses a platform cookie, which is a non-volatile cookie of 32 bytes length that contains unique hardware information, including a hardware identifier for the device. Paragraph [0213] of Lamkin relied on by the Examiner appears to disclose that the unique hardware information in the platform cookie is used to generate a disk cookie, which is a volatile cookie of 214 bytes length that contains currently inserted disk information including a unique ID generated by local hardware based on a hashing algorithm provided by InterActual and the id field from PCFriendly titles (based on the file DISC.ID) provided the disk is a PCFriendly (PCF) disk. Paragraphs [0207] and [0208] of Lamkin disclose that the platform cookie and the disk cookie are system cookies that are automatically created and modified by the player hardware and the embedded web browser, in contrast to general-purpose cookies that are placed by web pages.

Column 8, lines 38-41, of Montulli discloses that the domain=DOMAIN_NAME attribute defines a domain for which a cookie is valid, and is usually set using the domain name of the sending Web server. Column 8, lines 55-57, of Montulli discloses that if no domain name is specified, the default value of the domain attribute is the domain name of the server that generated the cookie header. Column 8, lines 41-45, of Montulli discloses that client systems examine the domain attribute when making later http requests, and if the server that the client system is accessing falls within the defined DOMAIN_NAME, then the cookie may be sent to the server when making the http request.

However, Lamkin's platform cookie, unlike the cookies described in Montulli, is not generated by a server that is accessed by Lamkin's DVD device 602, but is generated by the player hardware and the embedded web browser of Lamkin's DVD device 602. It is not seen

where anything whatsoever in Lamkin discloses or suggests that Lamkin's DVD device 602 is assigned a domain name that could be used to set the domain attribute when Lamkin's platform cookie is generated. Nor is it seen where Lamkin discloses that the platform cookie is used "to track general categories of state dependent information," to use the Examiner's language.

Since the Examiner considers Montulli to teach "a method of using the domain attribute to track general categories of state dependent information," and Montulli discloses that the domain attribute is set by a server that generates a cookie, and since Lamkin discloses that the platform cookie is generated by the player hardware and the embedded web browser of Lamkin's DVD device 602, rather than by a server that is accessed by Lamkin's DVD device 602, and does not disclose that the platform cookie is used "to track general categories of state dependent information," it is submitted that there would have been no reason for one of ordinary skill in the art to modify Lamkin to generate a cookie comprising "a domain attribute identifying the interactive digital content reproducing apparatus as a domain" as recited in claim 1 based on the teachings of Montulli as proposed by the Examiner.

For at least the foregoing reasons, it is submitted that Lamkin and Montulli do not disclose or suggest the feature "wherein the interpreter executes the cookie generation command program of the command program to: generate a cookie comprising: cookie data to be used by the interactive digital content reproducing apparatus in a subsequent interactive digital content reproducing operation performed in the interactive digital content reproducing apparatus; and a domain attribute identifying the interactive digital content reproducing apparatus as a domain; and store the cookie in the non-volatile data storage portion of the data storage unit" recited in claim 1.

Claim 8

It is submitted that Lamkin and Montulli do not disclose or suggest the combination of "a decoder to decode the AV data" as recited in dependent claim 8 and the feature "wherein the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder by the interpreter under control of the cookie generation command program" recited in claim 8.

The Examiner states "Lamkin teaches wherein the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder by the interpreter under control of the cookie generation command program commands because Lamkin teaches a cookie manager, i.e., a decoder decoding a read content, and a command program which operates to control the data storage unit by extracting predetermined target information (p. 7, par. 132-135; par 12, par. 207-214), and commands the generated cookie information to be stored in the data storage unit (p. 11, par. 205-206).

However, the Examiner has not identified anything whatsoever in the portions of Lamkin relied on by the Examiner that the Examiner considers to be "a system variable" as recited in claim 8 of Lamkin's DVD device 602, such that the Examiner has not established a *prima facie* case of obviousness with respect to claim 8.

Furthermore, the rejection is based entirely on the Examiner's position that that Lamkin's cookie manager is 708 is "a decoder" as recited in claim 8. However, claim 8 recites "a decoder to decode the AV data," and it is submitted that Lamkin's cookie manager 708 is not "a decoder to decode the AV data" as recited in claim 8. Accordingly, since the entire basis of the Examiner's position is incorrect, it is submitted that the Examiner has not established a *prima facie* case of obviousness with respect to claim 8.

Furthermore, it is not seen where any of the portions of Lamkin relied on by the Examiner disclose or suggest that a state of a system variable of Lamkin's DVD device 602 is obtained from a decoder that decodes AV data by an interpreter under control of a cookie generation command program as would be necessary for these portions of Lamkin to arguably disclose or suggest the feature "wherein the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder by the interpreter under control of the cookie generation command program" recited in claim 8.

Claim 52

It is submitted that Lamkin and Montulli do not disclose or suggest "a markup document supporting an interactive function for reproducing the AV data and comprising a cookie generation command program" as recited in independent claim 52, or the feature "wherein the cookie generation command program controls the interactive digital content reproducing

apparatus to: generate a cookie comprising: cookie data to be used by the interactive digital content reproducing apparatus in a subsequent interactive digital content reproducing operation performed in the interactive digital content reproducing apparatus; and a domain attribute identifying the interactive digital content reproducing apparatus as a domain; and store the cookie in the non-volatile data storage portion of the data storage unit" recited in claim 52, for at least the same reasons discussed above that Lamkin and Montulli do not disclose or suggest the same or similar features of claim 1.

Claim 58

It is submitted that Lamkin and Montulli do not disclose or suggest the combination of "a decoder to decode the AV data" as recited in dependent claim 58 and the feature "wherein the cookie generation command program controls the interactive digital content reproducing apparatus to: obtain a state of a system variable of the interactive digital content reproducing apparatus from the decoder; and include the state of the system variable in the cookie data" as recited in claim 58 for at least the same reasons discussed above that Lamkin and Montulli do not disclose or suggest the combination of the same or similar features of claim 8.

Claim 67

It is submitted that Lamkin and Montulli do not disclose or suggest "a markup document supporting an interactive function for reproducing the AV data and comprising a cookie generation command program" as recited in independent claim 67, or "generating a cookie using the cookie generation command program, the cookie comprising: cookie data to be used by the interactive digital content reproducing apparatus in a subsequent interactive digital content reproducing operation performed in the interactive digital content reproducing apparatus; and a domain attribute identifying the interactive digital content reproducing apparatus as a domain; and storing the cookie in the non-volatile data storage portion of the data storage unit" as recited in independent claim 67, for at least the same reasons discussed above that Lamkin and Montulli do not disclose or suggest the same or similar features of claim 1.

Claim 69

It is submitted that Lamkin and Montulli do not disclose or suggest the feature "wherein the system variable is a play state system variable of the interactive digital content reproducing apparatus" recited in dependent claim 69.

The Examiner states "Lamkin teaches wherein the system variable is a play state system variable of the interactive digital content reproducing apparatus (p. 7, par. 0129-0131; p. 14-33)."

Assuming *arguendo* that the portions of Lamkin relied on by the Examiner disclose system variables of Lamkin's DVD device 602, the Examiner has not identified which one of these system variables the Examiner considers to be "a play state system variable" as recited in claim 69, such that the Examiner has not established a *prima facie* case of obviousness with respect to claim 69.

Furthermore, it is submitted that the Examiner has not established that Lamkin and Montulli disclose or suggest the combination of "a decoder to decode the AV data" and the feature "wherein the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder by the interpreter under control of the cookie generation command program" recited in claim 8 from which claim 69 depends for at least the reasons discussed above in connection with claim 8.

Claim 70

It is submitted that Lamkin and Montulli do not disclose or suggest the feature "wherein the system variable is a parental level system variable of the interactive digital content reproducing apparatus" recited in dependent claim 70.

The Examiner states "Lamkin teaches wherein the system variable is a parental level system variable of the interactive digital content reproducing apparatus (p. 67, C.1.10; par. 42; A.2.13)."

However, claim 8 from which claim 70 depends recites that "the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder," and the Examiner has not pointed out where Lamkin discloses or suggests that the state of the InterActual.SelectParentalCountry command described on page 67 of Lamkin or the

state of the InterActual.ParentalLevel property described on page 42 of Lamkin is "cookie data" as recited in claim 8 from which claim 70 depends.

Furthermore, it is submitted that the Examiner has not established that Lamkin and Montulli disclose or suggest the combination of "a decoder to decode the AV data" and the feature "wherein the cookie data comprises a state of a system variable of the interactive digital content reproducing apparatus obtained from the decoder by the interpreter under control of the cookie generation command program" recited in claim 8 from which claim 70 depends for at least the reasons discussed above in connection with claim 8.

Conclusion—Claim Rejections Under 35 USC 103

For at least the foregoing reasons, it is respectfully requested that the rejection of claims 1-3, 6-13, 15-25, 52-54, and 57-70 (i.e., claims 1, 8, 52, 58, 67, 69, and 70 discussed above and claims 2, 3, 6, 7, 9-13, 15-25, 53, 54, 57, 59-66, and 68 depending directly or indirectly from claims 1, 8, and 52) under 35 USC 103(a) as being unpatentable over Lamkin in view of Montulli be withdrawn.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

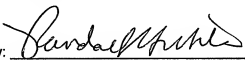
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with the filing of this paper, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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